

# Virginia Environmental Excellence Program Application

(More information available at [www.deq.virginia.gov/veep/app.html](http://www.deq.virginia.gov/veep/app.html))

Section 1: General Facility/Organization Information	
Facility Name:	
Street Address:	
Mailing Address:	
Contact Name:	Standard Industrial Classification (SIC) Code:
Phone:	Environmental Permit Numbers (List <u>all</u> , including permits from agencies other than DEQ. For more information, please see instructions.)
Fax:	
Email:	
Previous Facility Names (within past 5 years):	Water Source (e.g., public water supply, groundwater, etc.):
Brief Description of Facility's Primary Function and Activities	

Section 2: Type of Participation
This application is for:  <input type="checkbox"/> Environmental Enterprise (E2) <i>[see Section 3]</i>  <input type="checkbox"/> Exemplary Environmental Enterprise (E3) <i>[see Section 4]</i>  <input type="checkbox"/> Extraordinary Environmental Enterprise (E4) <i>[see Section 5]</i>

<i>Certification Statement:</i> By submitting this application the undersigned acknowledges that participation in this program is entirely voluntary. The undersigned accepts and hereby waives any right to appeal any decision made by DEQ with respect to this application regarding participation in or termination from this program.	
Name of Certifying Official:	Title:
Signature:	Date:

### Section 3: E2 Application

The development and implementation of effective environmental management systems (EMS) is the primary goal of VEEP. DEQ does not prescribe the model or type of EMS or the structure of a facility's environmental programs. However, DEQ is responsible for verifying that each facility accepted into VEEP meets the program criteria. Therefore, each E2 applicant is required to address several key points related to its EMS. Please provide documentation that shows that the following components are in place at your facility.

**Policy Statement:** Attach the facility's Policy Statement outlining its commitment to the environment. When reviewing each application, DEQ staff will look for an environmental policy statement that:

- Includes/stresses compliance, pollution prevention, training, communication & continuous improvement
- Addresses elements that are supported by EMS activities

**Identification of Environmental Impacts:** Describe the facility's process for identifying and evaluating its environmental impacts. At a minimum, include a list of the facility's most significant environmental impacts. When reviewing each application, DEQ staff will look for:

- Comprehensive list of impacts/aspects
- Method for determining significant impacts/aspects
- Impact/aspect review process outlined
- Scheduled review and reevaluation of impacts

**Setting Objectives and Targets:** Please include a list of the facility's goals (objectives) for reducing environmental impacts. Ideally, objectives will include numerical goals with projects designed to achieve these goals. The objectives should include targets or a schedule for completing tasks and/or achieving the stated objectives. When reviewing each application, DEQ staff will look for:

- Goals (or objectives) which address your significant impacts/aspects
- Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation

**Pollution Prevention:** In a typical EMS structure, objectives and targets may only address the impacts identified as the most "significant." For the pollution prevention section, please feel free to list any other environmental projects that are ongoing or planned. If possible, please include quantified reductions realized or expected and any cost savings. When reviewing each application, DEQ staff will look for:

- A dedicated pollution prevention section listing projects & accomplishments
- Quantified results and costs savings
- Pollution prevention activities outside of significant impacts/aspects

**E2 Environmental Results Commitment:** E2 facilities are required to commit to report on at least one of the environmental measures listed below in their annual reports, which are due by April 1st each year for the previous calendar year. Facilities can report on a specific project that falls within one of the categories (i.e., switching to a non-hazardous parts washer to reduce hazardous waste generation) or their results for reducing the entire waste stream (i.e., energy use for the entire facility). The ability to measure and report progress is critical to the administration and overall tracking of VEEP. Ideally, each participating facility will establish baselines and track progress on all of the environmental measures that are being addressed through their EMS. At a minimum, E3 facilities are required to commit to track EMS results in at least one of the following categories (a list of specific subcategories or “indicators” for each of the categories is available on the VEEP website):

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Air emissions | <input type="checkbox"/> Energy use          | <input type="checkbox"/> Water discharges |
| <input type="checkbox"/> Water use     | <input type="checkbox"/> Waste               | <input type="checkbox"/> Materials use    |
| <input type="checkbox"/> Land use      | <input type="checkbox"/> Product performance | <input type="checkbox"/> Other            |

**E2 Environmental Compliance Requirements:** As defined by Section 10.1-1187.1 of the Code of Virginia, record of sustained compliance means that "the person or facility (i) has no judgment or conviction entered against it, or against any key personnel of the person or facility or any person with an ownership interest in the facility for a criminal violation of the environmental protection laws of the United States, the Commonwealth, or any state in the previous five years; (ii) has been neither the cause of, nor liable for, more than two significant environmental violations in the previous three years; (iii) has no unresolved notices of violations or potential violations of environmental requirements with Department or one of the Boards; (iv) is in compliance with the terms of any order or decree, executive compliance agreement, or related enforcement measure issued by the Department, one of the Boards, or the U.S. Environmental Protection Agency; and (v) has not demonstrated in any other way an unwillingness or inability to comply with environmental protection requirements". DEQ will conduct a review of each applying facility's compliance record, including a review of EPA records as appropriate.

## Section 4: E3 Application

The development and implementation of effective environmental management systems (EMS) is the primary goal of VEEP. DEQ does not prescribe the model or type of EMS or the structure of a facility's environmental program. However, DEQ is responsible for verifying that each facility accepted into VEEP meets the program criteria. Therefore, each E3 applicant is required to address several key points related to its EMS. Please provide documentation that shows that the following components are in place at your facility.

**Policy Statement.** Attach the facility's Policy Statement outlining its commitment to the environment. When reviewing each application, DEQ staff will look for an environmental policy statement that:

- Includes/stresses compliance, pollution prevention, training, communication & continuous improvement
- Addresses elements that are supported by EMS activities outlining the facility's commitment to the environment

**Identification of Environmental Impacts.** Describe the facility's process for identifying and evaluating its environmental impacts. At a minimum, include a list of the facility's most significant environmental impacts. When reviewing each application, DEQ staff will look for:

- Comprehensive list of impacts/aspects
- Method for determining significant impacts/aspects (e.g., a matrix)
- Impact/aspect review process outlined
- Scheduled review and reevaluation of impacts/aspects

**Setting Objectives and Targets.** Please include a list of the facility's goals (objectives) for reducing environmental impacts. Ideally, objectives will include numerical goals with projects designed to achieve these goals. The objectives should include targets or a schedule for completing tasks and/or achieving the stated objectives. When reviewing each application, DEQ staff will look for:

- Goals (or objectives) which address your significant impacts/aspects
- Tasks or projects planned for addressing each goal/objective with a targeted schedule for implementation

**Pollution Prevention.** In a typical EMS structure, objectives and targets may only address the impacts identified as the most "significant." For the pollution prevention section, please feel free to list any other environmental projects that are ongoing or planned. If possible, please include quantified reductions realized or expected, and any cost savings. When reviewing each application, DEQ staff will look for:

- A dedicated pollution prevention section listing projects and accomplishments
- Quantified results and cost savings
- Pollution prevention activities outside of significant impacts/aspects

**Legal Requirements.** Each facility should have a mechanism for tracking changes in environmental compliance requirements. Provide a description of this function.

**Roles, Responsibilities and Authorities.** Each facility should have a system for defining, documenting and maintaining roles, responsibilities and authorities for its environmental management system. When reviewing each application, DEQ staff will look for:

- Assignments for projects, tasks or reporting responsibilities
- Upper management involvement or review

**Reporting & Record Keeping.** Each facility should have an effective system of documenting the status of environmental management system operations and activities.

**Training.** Each facility should have procedures for ensuring that *all* employees have the necessary training relative to their roles in the facility's EMS.

**Emergency Response Procedures.** Each facility should have effective procedures in place for responding to, reporting, mitigating and reviewing incidents. When reviewing each application, DEQ staff will look for:

- Evidence that the facility emergency management program is coordinated with local emergency response efforts.
- If an event were to take place, does the EMS have procedures in place to mitigate and reduce the likelihood of future events?

### **Monitoring, Investigative, and Corrective Actions for Noncompliance with EMS.**

The EMS should include provisions which address such events. When reviewing each application, DEQ staff will look for evidence that all such events are effectively addressed within the framework of the EMS and that the likelihood of "repeat offenses" has been significantly reduced or eliminated.

**Voluntary Self-Assessments.** Each facility should have a system that provides for either external or internal EMS auditing. DEQ reviewers will be looking for an indication of each auditing system and any certifications that might result.

**Communicating With and Informing External and Internal Audiences.** Each facility's EMS activities should be accessible to all employees and the general public. When reviewing applications, DEQ staff will be looking for:

- Easily accessible (e.g., web-based) EMS materials & communication
- Meetings with the public and staff regarding EMS/environmental efforts

**E3 Environmental Results Commitment:** E3 facilities are required to commit to report on at least two of the environmental measures listed below in their annual reports, which are due by April 1st each year for the previous calendar year. Facilities can report on a specific project that falls within one of the categories (i.e., switching to a non-hazardous parts washer to reduce hazardous waste generation) or their results for reducing the entire waste stream (i.e., energy use for the entire facility). The ability to measure and report progress is critical to the administration and overall tracking of VEEP. Ideally, each participating facility will establish baselines and track progress on all of the environmental measures that are being addressed through their EMS. At a minimum, E3 facilities are required to commit to track EMS results in at least two of the following categories (a list of specific subcategories or "indicators" for each of the categories is available on the VEEP website):

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Air emissions | <input type="checkbox"/> Energy use          | <input type="checkbox"/> Water discharges |
| <input type="checkbox"/> Water use     | <input type="checkbox"/> Waste               | <input type="checkbox"/> Materials use    |
| <input type="checkbox"/> Land use      | <input type="checkbox"/> Product performance | <input type="checkbox"/> Other            |

**E3 Environmental Compliance Requirements:** As defined by Section 10.1-1187.1 of the Code of Virginia, record of sustained compliance means that "the person or facility (i) has no judgment or conviction entered against it, or against any key personnel of the person or facility or any person with an ownership interest in the facility for a criminal violation of the environmental protection laws of the United States, the Commonwealth, or any state in the previous five years; (ii) has been neither the cause of, nor liable for, more than two significant environmental violations in the previous three years; (iii) has no unresolved notices of violations or potential violations of environmental requirements with Department or one of the Boards; (iv) is in compliance with the terms of any order or decree, executive compliance agreement, or related enforcement measure issued by the Department, one of the Boards, or the U.S. Environmental Protection Agency; and (v) has not demonstrated in any other way an unwillingness or inability to comply with environmental protection requirements." DEQ will conduct a review of each applying facility's compliance record, including a review of EPA records as appropriate.

## Section 5: E4 Application

To be accepted into VEEP at the E4 level, facilities must either apply and be accepted into EPA's Performance Track program ([www.epa.gov/performance-track](http://www.epa.gov/performance-track)) or separately apply to DEQ providing the following information.

**EMS Documentation:** The development and implementation of effective EMS is the primary goal of VEEP. DEQ does not prescribe the model or type of EMS or the structure of a facility's environmental programs. However, DEQ is responsible for verifying that each facility accepted into VEEP meets the program criteria. Therefore, each E4 applicant is required to address key points related to its EMS, which are outlined above in Section 4.

**Third Party EMS Audit Documentation:** E4 facilities are required to submit documentation showing that they have completed at least one full cycle of their EMS and that it has been reviewed and verified by an unrelated third party. DEQ defines "unrelated third party" as being financially independent from the facility, employed by a separate company and not involved in the development of the EMS.

**Commitment to Continuous and Sustainable Environmental Progress & Community Involvement:** E4 facilities are required to document that they have committed to continuous and sustainable environmental progress and community involvement. Because each facility's situation in terms of purpose, location and impacts may prove unique from other facilities, DEQ can provide examples of sustainable environmental progress and community involvement measures for prospective E4 facilities to consider when preparing an application.

**E4 Environmental Results Commitment:** E4 facilities are required to commit to report on at least three of the environmental measures listed below in their annual reports, which are due by April 1st each year for the previous calendar year. Facilities can report on a specific project that falls within one of the categories (i.e., switching to a non-hazardous parts washer to reduce hazardous waste generation) or their results for reducing the entire waste stream (i.e., energy use for the entire facility). The ability to measure and report progress is critical to the administration and overall tracking of VEEP. Ideally, each participating facility will establish baselines and track progress on all of the environmental measures that are being addressed through their EMS. At a minimum, E4 facilities are required to commit to track EMS results in at least three of the following categories (a list of specific subcategories or "indicators" for each of the categories is available on the VEEP website):

- |  |  |   |
|--|--|---|
| <input type="checkbox"/> Air emissions | <input type="checkbox"/> Energy use          | <input type="checkbox"/> Water discharges |
| <input type="checkbox"/> Water use     | <input type="checkbox"/> Waste               | <input type="checkbox"/> Materials use    |
| <input type="checkbox"/> Land use      | <input type="checkbox"/> Product Performance | <input type="checkbox"/> Other            |

**E4 Environmental Compliance Requirements:** As defined by Section 10.1-1187.1 of the Code of Virginia, record of sustained compliance means that "the person or facility (i) has no judgment or conviction entered against it, or against any key personnel of the person or facility or any person with an ownership interest in the facility for a criminal violation of the environmental protection laws of the United States, the Commonwealth, or any state in the previous five years; (ii) has been neither the cause of, nor liable for, more than two significant environmental violations in the previous three years; (iii) has no unresolved notices of violations or potential violations of environmental requirements with Department or one of the Boards; (iv) is in compliance with the terms of any order or decree, executive compliance agreement, or related enforcement measure issued by the Department, one of the Boards, or the U.S. Environmental Protection Agency; and (v) has not demonstrated in any other way an unwillingness or inability to comply with environmental protection requirements." DEQ will conduct a review of each applying facility's compliance record, including a review of EPA records as appropriate.